

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222  
(303) 692-3300

Notice of Inspection

|   |                     |              |   |  |
|---|---------------------|--------------|---|--|
| Facility Name<br>Rocky Flats Environmental Technology Site<br>(units 21, 24 and Solar Ponds Area)   |                     |              | EPA I.D. #<br>C07890010526                                | Date<br>9/25/97                              |
| Street<br>P.O. Box 928  |                     |              | Telephone #<br>(303) 966-7000                             | Seq. #<br>N/A                                |
| City<br>Golden  | County<br>Jefferson | Zip<br>80402 | Inspection Arranged Prior to Inspection<br>( ) Yes ( ) No |  |
| Facility Representatives and Titles   |                     |              | Enter By :<br>(X) Consent ( ) Warrant                     | Hour In:<br>8:00 am<br>Hour Out:<br>12:00 pm |
|   |                     |              | Agency: (X) State ( ) Oversight ( ) Joint                 |  |
| NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or<br>Other _____ If Status Changed, Facility Should Revise Notification |                     |              |   |  |

COMMENTS:

1. The waste pump in unit 21 and the Pond Skimmer located to the west of unit 21 have been radiologically contaminated and contaminated w/ F-listed waste. These items appear to be hazardous debris and should be managed in accordance with state Hazardous Waste regulations, unless demonstrated otherwise.
2. Hazardous waste warning signs at the solar ponds need to be re-posted.
3. Facility Diagram for unit 24 should be updated to reflect crate storage, if crates will be ~~the~~ stored in that unit.

Compliance Assistance: N/A Compliance Information \_\_\_\_\_ Referral to Compliance Assistance \_\_\_\_\_ Pollution Prevention \_\_\_\_\_ Field Assistance \_\_\_\_\_

|  |    |
|--|----|
| Samples, Documents, Plans, and / or Photos Collected | 4. |
| 1. Respond to the above in writing                   | 5. |
| 2. by October 10, 1997                               | 6. |
| 3.   | 7. |

Samples requested and received by facility: ( ) Yes ( ) No If Yes: ( ) Duplicate ( ) Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

*[Signature]* 9-25-97  
Signature of Facility Representative

Lead Inspector: Ed Smith  
Assisting Inspector(s) and Multimedia Participant(s):

James Hindman

**Colorado Department of Public Health and Environment**  
**Hazardous Materials and Waste Management Division**

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206 2

**Notice of Inspection**

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| Facility Name (Unit 21, 24 and Solar Ponds)<br><b>Rocky Flats Env. Technology Site</b>   |                         |                     | EPA I.D. #<br><b>CO 7890010526</b>                        | Date<br><b>9/25/97</b>       |
| Street<br><b>P.O. Box 978</b>  |                         |                     | Telephone #<br><b>(303) 966-7000</b>                      | Seq. # <b>N/A</b>            |
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**COMMENTS:**

4. Ship crates of unit 18.03 number P02246 and P02264 within 30 days or justify why the LDR storage prohibition is not being met.
5. Provide WEMMS Reports for: X00266, D86620, D61103, P00688, D64927, D86623, D84746, and H04886.

**Compliance Assistance:** N/A Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance ☐

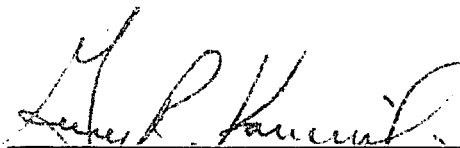
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Signature of Facility Representative **9-25-97**

Lead Inspector: **Ed Smith**  
Assisting Inspector(s) and Multimedia Participant(s):  
**James Hindman**

# STATE OF COLORADO

Roy Romer, Governor  
Patti Shwayder, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

**HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION**  
<http://www.cdphe.state.co.us/hm/>

4300 Cherry Creek Dr. S.  
Denver, Colorado 80246-1530  
Phone (303) 692-3300  
Fax (303) 759-5355

222 S. 6th Street, Room 232  
Grand Junction, Colorado 81501-2768  
Phone (303) 248-7164  
Fax (303) 248-7198



**Colorado Department  
of Public Health  
and Environment**

October 20, 1997

Karan North  
Kaiser-Hill Company, L.L.C  
Rocky Flats Environmental Technology Site  
P.O. Box 464  
Golden, CO 80402-0464

**RE: Close-Out of the September 25, 1997 Inspection of the Solar Evaporation Ponds, RCRA Unit 21,  
and RCRA Unit 24; EPA Identification Number C07890011526**

Dear Ms. North:

On September 25, 1997, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a routine compliance evaluation inspection of the Solar Evaporation Ponds (SEPs), RCRA Unit 21, and RCRA Unit 24. The Division has received and reviewed your response to that inspection, dated October 8, 1997, and does not intend to take any further action in response to that inspection, at this time. However, as discussed below, followup is required for one issue identified during the September 25, 1997 inspection.

During inspection of the SEPs, Division inspectors identified at least three pieces of contaminated equipment that the Division believes require management as hazardous debris. Division inspectors have discussed this matter with representatives of Kaiser-Hill who have agreed that a Class II permit modification to the RFETS RCRA Permit would be developed to address the treatment of those pieces of hazardous debris. Please provide the Division with a schedule identifying the anticipated completion date for that permit modification request. In the interim, the Division expects that the identified pieces of hazardous debris will be managed in accordance with applicable portions of the Colorado Hazardous Waste Act and its implementing regulations.

The Division appreciates your timely and complete response to the issues identified during the inspection of September 25, 1997. Please contact Ed Smith or James Hindman at (303) 692-3386 or (303) 692-3345, respectively, if you have any questions regarding this memorandum or the close-out of the inspection.

Sincerely,

Joe Schieffelin, Unit Leader  
Federal Facilities Permitting and Compliance  
Hazardous Materials & Waste Management Division

cc: Dan Miller, AGO (w/o attachment)      Bob April (with attachment)  
Linda Jacobson, EPA (w/o attachment)      Karan North (with attachment)  
Tim Reyder, EPA (w/o attachment)      Gary Konwinski (with attachment)  
John Wrapp, K-H (w/o attachment)  
Jefferson County Health Department (w/o attachment)

**Best Available Copy**

**ADMIN RECCRD**

IA-A-000446

V12

EPA I.D. #CO7890010526

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: September 25, 1997

FACILITY: Rocky Flats Environmental Technology Site - US DOE,  
Solar Evaporation Ponds, Unit 21, and Unit 24

LOCATION: 16 miles NW of Denver  
Golden, CO 80402

FACILITY REP: Gary Konwinski

TELEPHONE: 303-966-2729

TELEFAX:

NOTIFICATION STATUS: Large Quantity Generator  
Land Disposal Facility

TYPE OF INSPECTION: Compliance Evaluation Partial

PARTICIPANTS: James Hindman, CDPHE  
Edward Smith, CDPHE  
Steve Dewitt, RMRS  
Gary Konwinski, RMRS  
Bob Kathel, RMRS  
Pete Sauer, RMRS

WEATHER CONDITIONS: Warm and sunny

TIME IN: 8:00 am, September 25, 1997

TIME OUT: 11:30 am, September 25, 1997

# **US DOE - Rocky Flats Environmental Technology Site**

## **Solar Evaporation Ponds, Unit 21 and Unit 24**

### **--- INTRODUCTION ---**

On the morning of September 25, 1997, inspectors James Hindman and Edward Smith from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) arrived at the Rocky Flats Environmental Technology Site (RFETS) to conduct a partial compliance evaluation inspection of the Solar Evaporation Ponds (SEPs), Unit 21, and Unit 24.

**Solar Evaporation Ponds.** The SEPS consist of five surface impoundments designated as SEPs 207-A, 207-B North, 207-B Center, 207-B South, and 207-C. The size and approximate volume of the ponds are as follows: SEP 207-A is 250 feet wide by 525 feet long with a capacity of 5 million gallons; SEPs 207-B North, Center and South are each 180 feet wide by 253 feet long with a capacity of 1.5 million gallons; and SEP 207-C is 160 feet wide by 250 feet long with a capacity of 1.2 million gallons. Historically, the SEPs were used for the storage and evaporation of radioactive process waste containing high levels of nitrate and aluminum hydroxide. Additionally, waste that was managed within the SEPs has been designated as a hazardous waste assigned the F-listed waste codes of F001, F002, F005, F006, F007, and F009 along with various characteristic hazardous waste codes. The basins are now all empty; however, the clarifier still contains hardened pond sludge.

**Building 788, Unit 21.** In 1985, construction began on Building 788, located between SEPs 207-C and 207-A, as a storage facility for the pondcrete waste containers. Construction of Building 788 was completed in October 1986. Fresh pondcrete was loaded into waste containers and placed in the southern end of Building 788 where the pondcrete cured. After curing, the containers were moved to the northern pad adjacent to Building 788. In 1988, an addition (Building 788A) was constructed on the northern end of Building 788 to increase the pondcrete storage area. In 1989, a containment structure was constructed in the northwestern end of Building 788 to accommodate the repackaging of waste containers of pondcrete.

**Building 964, Unit 24.** Unit 24 is located inside the Protected Area to the east of SEP 207-B. The building is a wood framed structure covered with galvanized steel siding and a rolled asphalt roof. Building 964 has a floor area of approximately 6,500 square feet. It was constructed in the late 1960's and was originally used as a tool shed. Building 964 became a waste storage facility in 1985 or 1986 when it was used to store pondcrete. Upon construction of the 750 Pad in 1987-1988, pondcrete was transferred to the pad and Building 964 was then used to store vacuum filter sludge generated in Building 374. A RCRA Part A permit application was submitted in 1986 which identified Building 964 as RCRA Unit 24. Building 964 became a permitted storage area in October 1991.

### --- OPERATIONS INSPECTED ---

Accompanied by facility representatives, Division inspectors observed the north side of SEP 207-C, the remaining SEPs, RCRA Units 21 and 24, and the clarifier building. However, access to the clarifier itself was not allowed because a radiation work permit (RWP) and a step-off pad would have been required for access; neither of which were available or established at the time of the inspection.

**Solar Evaporation Ponds.** The inspection of the SEPs started with an evaluation of the items located to the northeast of SEP 207-C and adjacent to RCRA Unit 21. At that location, Division inspectors observed a cement mixer that was used in the past for the treatment of pond sludge via mixing with Portland cement. Division inspectors observed that the area was posted with two signs one sign read "RCRA Unit 48 Treatment Area" for the cement mixing area and the other sign read "RCRA Unit 48 Storage Area" for the SEPs.

In addition to the above, Division inspectors also observed a crate that was labeled as hazardous waste. Facility representatives stated that the crate contained a bulldozer that was used during the pond sludge cleanout activities. Division inspectors also observed several pieces of equipment to the north of SEP 207-C including a pond skimmer, a cement mixer, and three backhoes. The pond skimmer and the three backhoes were wrapped in plastic due to radiological contamination. Division inspectors asked facility representatives if a waste determination had been made for any of the equipment in that area. Facility representatives indicated that the backhoes and the cement mixer could potentially be used in the future. However, they stated that there was no intended use for the pond skimmer. Division inspectors discussed the regulatory status of the pond skimmer and other equipment at that area as part of the close-out meeting.

Division inspectors proceeded to tour the remaining SEPs. Division inspectors observed that the hazardous waste warning sign located at the northwest corner of SEP 207-B North was on the ground. Facility representatives indicated that the wind had blown down the sign and that the sign would be reposted. Division inspectors also observed what looked like a junk yard to the west of the 207-B series ponds. Facility representatives indicated that the equipment, which included pumps, hoses, debris from the Halliburton treatment process, and miscellaneous junk, had been decontaminated after use or the items had not been contaminated at all.

**Building 788, RCRA Unit 21.** Accompanied by facility representatives, Division inspectors observed all areas of RCRA Unit 21. Unit 21 was being used primarily for the container and crate storage of wastes generated from operation of the SEPs, including pondcrete, various non-hazardous wastes, and a sludge pump. The sludge pump was wrapped in plastic due to radiological contamination and was posted as a contamination area. However, the pump was

not marked or labeled as a hazardous waste. Facility representatives indicated that the pump was used in the cleanout of the SEPs. Facility representatives further indicated that a gross decontamination had been performed on the pump. Division inspectors discussed the regulatory status of the sludge pump as part of the inspection close-out meeting. Division inspectors also observed that a spill kit was present within Unit 21 and an inventory of contents was included. Subsequent to the inspection, representatives of Kaiser-Hill were informed that the facility diagram in the RFETS RCRA Permit should be revised to reflect crate storage on the west side of RCRA Unit 21.

**Building 964, RCRA Unit 24.** Accompanied by facility representatives, Division inspectors proceeded to RCRA Unit 24. Division inspectors observed that the evacuation routes for Unit 24 were posted at the entrance to the building. Unit 24 was being used for the container storage of vacuum filter sludge generated in Building 374 and also crate storage located on the east end of the building. Division inspectors observed that the facility diagram that was included in the RFETS RCRA Permit, at the time of the inspection, did not include crate storage and it also showed containment pans on the west end of the building; however no free liquids are allowed to be managed at this unit. Division inspectors discussed this matter as part of the inspection close-out. Finally, Division inspectors observed inspection logs for Unit 24 that were present at the unit. No issues were identified as a result of reviewing the inspection log sheets.

**Environmental Restoration (ER) Decontamination Unit.** As part of the inspection, Division inspectors also observed a decontamination unit that has historically been used for the decontamination of ER equipment, such as drilling rigs, augers, etc. The unit consists of a concrete pad with surrounding curtains where decontamination activities were conducted. Additionally, there are four tanks of approximately 4,000 gallons capacity each that are used to collect rinsate, according to facility personnel. Division inspectors observed that the tanks had been provided with secondary containment in the form of an earthen depression lined with a high density polyethylene (HDPE) liner. Facility personnel indicated that the unit was not used for the decontamination of items that were contaminated with hazardous waste. Items contaminated with hazardous waste were decontaminated at Unit 18.01. No issues were identified as a result of that inspection.

Division inspectors completed the physical inspection of these three RCRA units at approximately 10:30 am on September 25, 1997.

### **--- DOCUMENTS REVIEWED ---**

After completing the physical inspection, Division inspectors proceeded to T893A to conduct a document review. The following documents were reviewed as part of that effort:

1. Clarifier tank inspection log sheets dating back to January 13, 1997 and the Solar Ponds transfer line inspection log sheets dating back to December 30, 1996. No issues were identified as a result of that inspection.
2. Inspection log sheets for the SEPs and RCRA Unit 21 dating back approximately one year. No issues were identified as a result of that review.
3. Training records for personnel associated with waste management activities at the Solar Ponds, RCRA Unit 21 and Unit 24. Review of that documentation was conducted subsequent to the close-out meeting. No issues were identified as a result of that review.
4. Subsequent to the inspection close-out, Division inspectors reviewed Waste and Environmental Management System (WEMS) reports for the following container numbers: X00266, D66103, P00688, D64927, D86623, D84746, and H04886. No issues were identified as a result of that review.

### **--- INSPECTION CLOSE-OUT ---**

As a result of the inspection, five issues were identified and shared with facility representatives during the inspection close-out meeting, which began at approximately 11:00 am on September 25, 1997. An additional issue was identified and shared with representatives of Kaiser-Hill subsequent to the inspection close-out meeting. Division inspectors requested a written response to the following issues by October 10, 1997.

1. The waste sludge pump in Unit 21 and the pond skimmer located to the west of Unit 21 have been radiologically contaminated and contaminated with F-listed hazardous waste. Those items appear to be hazardous debris and should be managed in accordance with the Colorado Hazardous Waste Regulations, unless a demonstration can be made that the equipment is not hazardous debris.
2. Hazardous waste warning signs at SEP 207-B North were on the ground at the time of the inspection.
3. The container configuration drawings for RCRA Unit 24 should be updated to reflect the crate storage on the east side of the building and to delete reference to the use of catch basins on the west side of the building since the storage of free liquids is prohibited in that unit. The container configuration drawings for RCRA Unit 21

should also be updated to reflect crate storage on the west side of the facility (Note: Kaiser-Hill representatives were informed of this issue subsequent to the inspection).

4. Crates number PO2246 and PO2264 should be shipped off-site within 30-days or provide a justification for why the land disposal restriction (LDR) storage prohibition is not being met.
5. Provide WEMS reports for the following container numbers: X00266, D66103, P00688, D64927, D86623, D84746, and H04886.
6. Subsequent to the inspection, representatives from Kaiser-Hill were informed by division inspectors that the crate containing a bulldozer and identified as hazardous waste is in a non-permitted storage configuration since RCRA Unit 48 does not include container storage.

Gary Konwinski signed the Notice of Inspection (NOI) as the facility representative. Division inspectors left a copy of the NOI with facility representatives and ended the inspection at approximately 11:30 am on September 25, 1997.

### --- INSPECTION FINDINGS ---

As a result of the inspection of the SEPs, RCRA Unit 21 and Unit 24, the following issues were identified as deficiencies with the Colorado Hazardous Waste Regulations:

1. The pond skimmer and sludge pump were not being managed as a hazardous waste. The sludge pump was not labeled or marked with the words "Hazardous Waste" or the accumulation start date as required by 6 CCR 1007-3, section 262.34(a)(2) and (3). The sludge pump was not being stored in a container (RCRA Unit 21 is only permitted for container storage) as required by 6 CCR 1007-3, section 264, Subpart I.  
  
The pond skimmer was not marked or labeled with the words "Hazardous Waste" or the accumulation start date as required by 6 CCR 1007-3, section 262.34(a)(2) and (3). Additionally, the pond skimmer was not being managed at a permitted unit that allows for the storage of hazardous debris, as required by 6 CCR 1007-3, section 100.10.
2. Crate Number X00266, containing a bulldozer contaminated with F-listed hazardous waste, was not being managed in an interim status or permitted unit that is approved for the storage of hazardous waste in containers as required by 6 CCR 1007-3, section 100.10.
3. Hazardous waste warning signs were not posted at the 207-B North Pond at the time of the inspection as required by 6 CCR 1007-3, section 265.14(c).

4. The container configuration drawings for RCRA Unit 21 and Unit 24 were not consistent with actual container configurations in those units as required by RFETS RCRA Permit, Condition III.C (Note: Kaiser-Hill was informed of the need to revise the container configuration for RCRA Unit 21 subsequent to the inspection).

--- SIGNATURE BLOCK ---

Prepared by: Edward H. Smith 10/16/97  
Edward Smith Date

Reviewed by: James A. Hindman 10/20/97  
James Hindman Date

Approved by: Joe Schieffelin 10/17/97  
Joe Schieffelin Date

--- ATTACHMENTS ---

1. NOI
2. RMRS' Response to the NOI

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division  
4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222  
(303) 692-3300

1 of 2

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COMMENTS:

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2. Hazardous waste warning signs at the solar ponds need to be re-posted.
3. Facility Diagram for unit 24 should be updated to reflect crate storage, if crates will be ~~also~~ stored in that unit.


Compliance Assistance: N/A Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance

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9-25-97

Lead Inspector: Ed Smith  
Assisting Inspector(s) and Multimedia Participant(s):  
James Hindman

**Part 3**  
**State Hazardous Waste Management Program**

**Colorado Department of Health**  
**Authority to Conduct Inspections**  
**25-15-301(3) C.R.S.**

The Department, by its duly authorized representatives, shall have the power to enter and inspect any property, premises, or place in which hazardous waste is reasonably believed to be located or in which relevant records may be located for the purpose of determining the compliance or noncompliance with any provision of this part 3 [the State Hazardous Waste Management Program], any rules and regulations promulgated pursuant to this part 3, or term or condition thereof, issued pursuant to this part 3. Unless an emergency exists or the Department has reason to believe that any unlawful activity is being conducted or will be conducted, the Department shall provide prior notification of such inspection, which inspection shall be during normal business hours. If such entry or inspection is denied or not consented to and no emergency exists, the Department is empowered to and shall obtain from the district court for the judicial district in which such property, premises, or place is located a warrant to enter and inspect any such property, premises, or place prior to entry and inspection. The district courts of this state are empowered to issue such warrants upon a showing that such entry and inspection is required to verify that the purposes of this part 3 are being carried out. Any information relating to proprietary processes or methods of manufacture or production obtained in the course of the inspection shall be kept confidential in accordance with section 24-72-204(3)(a)(IV), C.R.S., of the open records law. If samples are taken, the permittee shall be entitled to a receipt for such samples and, upon request, a sufficient portion to perform an analysis equivalent to that which the Department may perform.

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206 2

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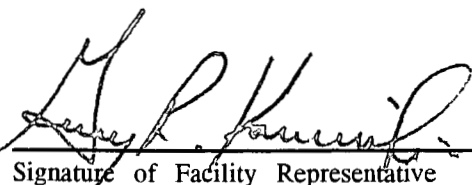
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James Hindman

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**Authority to Conduct Inspections**  
**25-15-301(3) C.R.S.**

The Department, by its duly authorized representatives, shall have the power to enter and inspect any property, premises, or place in which hazardous waste is reasonably believed to be located or in which relevant records may be located for the purpose of determining the compliance or noncompliance with any provision of this part 3 [the State Hazardous Waste Management Program], any rules and regulations promulgated pursuant to this part 3, or term or condition thereof, issued pursuant to this part 3. Unless an emergency exists or the Department has reason to believe that any unlawful activity is being conducted or will be conducted, the Department shall provide prior notification of such inspection, which inspection shall be during normal business hours. If such entry or inspection is denied or not consented to and no emergency exists, the Department is empowered to and shall obtain from the district court for the judicial district in which such property, premises, or place is located a warrant to enter and inspect any such property, premises, or place prior to entry and inspection. The district courts of this state are empowered to issue such warrants upon a showing that such entry and inspection is required to verify that the purposes of this part 3 are being carried out. Any information relating to proprietary processes or methods of manufacture or production obtained in the course of the inspection shall be kept confidential in accordance with section 24-72-204(3)(a)(IV), C.R.S., of the open records law. If samples are taken, the permittee shall be entitled to a receipt for such samples and, upon request, a sufficient portion to perform an analysis equivalent to that which the Department may perform.

**Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division**

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222  
(303) 692-3300

**Notice of Inspection**

|  |                            |                     |   |                              |
|--|----------------------------|---------------------|---|------------------------------|
| Facility Name<br><b>Rocky Flats Environmental Technology Site</b>  |                            |                     | EPA I.D. #<br><b>C07890010526</b>   | Date<br><b>10/15/97</b>      |
| Street<br><b>P.O. Box 928</b>  |                            |                     | Telephone #<br><b>(303) 966-7000</b>  | Seq. #                       |
| City<br><b>Golden</b>  | County<br><b>Jefferson</b> | Zip<br><b>80402</b> | Inspection Arranged Prior to Inspection<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No      | Hour In:<br><b>8:00 am</b>   |
| Facility Representatives and Titles<br><b>Bldg 205: Gary Kowinski, RMRS Env. Mgr.<br/>MICHAEL SIMMONS, MSC OPER. MGR</b>   |                            |                     | Enter By:<br><input checked="" type="checkbox"/> Consent <input type="checkbox"/> Warrant                           | Hour Out:<br><b>11:00 am</b> |
|  |                            |                     | Agency: <input checked="" type="checkbox"/> State <input type="checkbox"/> Oversight <input type="checkbox"/> Joint |                              |
| NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or<br><input type="checkbox"/> Other _____ If Status Changed, Facility Should Revise Notification |                            |                     |   |                              |

**COMMENTS:**

1. The led Plate No. 250 in Room 145 should be managed as a HW rather than excess chemicals. Any used oils in that same room should not be managed as "waste chemicals".
2. Mark containers of used oil per 6CCR 1007-3, section 279.32 if they will be recycled, or provide justification for why they cannot be recycled, the disposition and HW determination.
3. The drums of Ox-Out should be labeled as HW, dated with an accumulation start date and managed at the 90-day accumulation area.
4. Provide an inventory and HW determination with supporting justification for items in the Permacore.
5. Provide a HW determination for 3 drums on the south of Bldg
6. Provide an inventory for cargo containers on the south side of Bldg (K-H).

**Compliance Assistance:** ☐ Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance

|  |   |
|--|---|
| Samples, Documents, Plans, and/or Photos Collected | 4. <b>① Review of TSP reports are pending</b> |
| 1. <b>Provide a written response to</b>            | 5.  |
| 2. <b>the above by October 30, 1997</b>            | 6.  |
| 3.   | 7.  |

Samples requested and received by facility: ☐ Yes ☐ No If Yes: ☐ Duplicate ☐ Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

**Gary R. Kowinski 10-15-97**  
**Michael Simmons 10-15-97**

Signature of Facility Representative

Lead Inspector: **Gary R. Kowinski**

Assisting Inspector(s) and Multimedia Participant(s):

**Michael Simmons**

**Ed [unclear]**

**Part 3**  
**State Hazardous Waste Management Program**

**Colorado Department of Health**  
**Authority to Conduct Inspections**  
**25-15-301(3) C.R.S.**

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